

NATIONAL ORGANIC STANDARDS BOARD
FINAL RECOMMENDATION ADDENDUM NUMBER 2

BOTANICAL PESTICIDES POLICY

Date adopted: October 14, 1994
Location: Rohnert Park, California

COMMENTARY

The National Organic Standards Board (NOSB) is charged with the responsibility of conducting a special review of botanical pesticides under Section 2119(k)(4) of the Organic Foods Production Act of 1990 (OFPA): "The Board shall, prior to the establishment of the National List, review all botanical pesticides used in agricultural production and consider whether any such botanical pesticide should be included in the list of prohibited natural substances."

The special review has been conducted with the following results:

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| 10/13/94 | Neem | Motion to add to the Prohibited Natural List was defeated. |
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| 10/13/94 | Nicotine | Tabled while identity and review are re-established. |
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| 10/13/94 | Pyrethrums | Motion to add to the Prohibited Natural List was defeated. |
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| 10/13/94 | Quassia | Removed from consideration |
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| 10/13/94 | Rotenone | Motion to add to the Prohibited Natural List was defeated. |
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| 10/13/94 | Ryania | Motion to add to the Prohibited Natural List was defeated. |
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| 10/13/94 | Sabadilla | Motion to add to the Prohibited Natural List was defeated. |
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| 10/13/94 | Strychnine | Tabled until TAP reviewers are found to complete review. |
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| 10/14/94 | Piperonyl Butoxide | Motion to add to the Approved Synthetic list as a synergist for use with botanicals was defeated. |
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29 Additionally more TAP reviewers or clarifications of unclear
30 points were requested for Rotenone and Ryania. More information
31 on all the botanicals is still coming in and will be evaluated as
32 it does.

33 This list of botanical pesticides is limited to those generic
34 substances that are commonly known, registered with the EPA under
35 FIFRA, and that have been used historically in organic crop
36 production because of their documented insecticidal properties.

37 RECOMMENDATION

38 The Board maintains that prevention should be a producer's
39 primary approach to pest management. Cultural and biological
40 techniques must be given the highest priority by producers and be
41 well documented in the Organic Farm Plan. Notwithstanding, the
42 Board recognizes that when cultural and biological practices fail
43 to provide adequate crop protection, the use of botanical
44 pesticides can be an effective second line defense.

45 It is the position of the Board that producers who use botanical
46 pesticides in organic crop production shall comply with the
47 restrictions set forth below:

- 48 1. Botanical pesticides shall only be utilized within the
49 context of a biorational pest management program and
50 shall not be the primary method of pest control set
51 forth in the Organic Farm Plan.
- 52 2. Producers shall utilize botanical pesticides in a
53 manner which is least toxic and least ecologically
54 disruptive.
- 55 3. All EPA label restrictions and directions need to be
56 followed. This includes livestock, crops, target
57 pests, safety precautions, pre-harvest intervals and
58 worker re-entry.
- 59 4. In light of the fact that the Sunset Provision in
60 Section 2118 of OFPA does not apply to Botanicals
61 unless they are prohibited, and serious data gaps have
62 been identified in some areas, the NOSB recommends that
63 a comprehensive review of Botanicals occur within 5
64 years of implementation of OFPA.

65 Furthermore, the Board concludes that it is not possible to
66 define the "cautious and judicious use" of botanical pesticides

67 on a national basis, and therefore asserts its position that
68 organic certifying agencies shall monitor the use of particular
69 botanical pesticides as appropriate to local situations and shall
70 assure that these recommendations are strictly adhered to.
71 Additionally, certifiers may use their discretion on further
72 restricting the pre-harvest interval beyond the minimum label
73 requirements.